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7 Attorneys for Plaintiff  
8 Blaine Harrington III

9  
10 IN THE UNITED STATES DISTRICT COURT  
11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

12 BLAINE HARRINGTON III,

13 Plaintiff,

14 v.

15 DEEPAK DUGAR, M.D. a MEDICAL  
16 CORPORATION,

17 Defendant.

Civil Action No. 2:22-cv-08230-PA-E

**PLAINTIFF'S ANSWERS TO  
DEFENDANT'S FIRST SET OF  
INTERROGATORIES**

18  
19  
20 Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure,  
21 plaintiff/counter-defendant Blaine Harrington III ("Plaintiff") submits these  
22 answers to defendant/counter-plaintiff Deepak Dugar, M.D. a Medical  
23  
24

1 Mr. Harrington would then review the results of the search to determine whether  
2 the photograph is being infringed, to check whether the photograph may have been  
3 previously licensed by the website/company, and to check whether the infringer (if  
4 any) is located within the United States or a jurisdiction where Mr. Harrington  
5 would be able to effectuate the takedown of the photograph.  
6

7 22. Identify any Takedown Notices you have issued since January 1, 2017  
8 directed to the host of a website, in which you identify a photograph in which you  
9 claim copyright and direct that the photo be removed from the website.

10 With respect to such takedown notice, identify the web host by its name and URL;  
11 the particular photograph; and the date and substance of any action taken by the  
12 host.  
13

14 **ANSWER:** Pursuant to Fed. R. Civ. P. 33(d), the answer to this  
15 interrogatory may be determined by examining the documents being produced by  
16 Plaintiff in response to Request for Production No. 10.  
17

18 23. Identify any agreement by which you have sold or licensed the  
19 Subject Photograph to any person since you created the photograph.

20 **ANSWER:** Plaintiff is not aware of the Subject Photograph previously  
21 being sold/licensed.  
22  
23  
24

1 Dated: May \_\_, 2023.

ALVES RADCLIFFE LLP

2 By: /s/ Scott E. Radcliffe

3 SCOTT E. RADCLIFFE  
4 Attorney for Plaintiff  
5 Blaine Harrington III

6 **CERTIFICATE OF SERVICE**

7 I hereby certify that on May \_\_, 2023, I served the foregoing document via  
8 e-mail to: Vincent L. Ravine, Esq. ([vince@vravinelaw.com](mailto:vince@vravinelaw.com)) and Jeffrey L.  
9 Squires, Esq. ([jsquires@squireslegal.com](mailto:jsquires@squireslegal.com)).  
10

11 /s/ Scott E. Radcliffe  
12 Scott E. Radcliffe, Esq.

**VERIFICATION**

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: 5/30/2023

*Maureen Harrington*  
ID pocBYCcMGa6BmVvXyNzFCB59

Maureen Harrington

## eSignature Details

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<b>Signer ID:</b>	<b>poeBYCcMGa6BmVvXyNzFCB59</b>
Signed by:	Maureen Harrington
Sent to email:	moharr@comcast.net
IP Address:	15.181.16.10
Signed at:	May 30 2023, 3:54 pm PDT